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Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DANIEL ROBBINS,

Petitioner,

vs.

JERRY HOWELL, *et al.*,

Respondent(s).

Case No. 2:19-cv-02153-APG-VCF

**MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONSE TO FIRST AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 20)**

(SIXTH REQUEST)

Respondents move this Court for an enlargement of time of 5 days from the current due date of February 17, 2021, up to and including February 22, 2021, in which to file their Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20). This Motion is made pursuant to Fed. R.Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the sixth enlargement of time sought by Respondents, and the request is brought in good faith and not for the purpose of delay.

DATED: February 17, 2021.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jaimie Stilz
Jaimie Stilz (Bar. No. 13772)
Deputy Attorney General

DECLARATION OF JAIMIE STILZ

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JAIMIE STILZ, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Daniel Robbins v. Jerry Howell, et al.*, Case No. 2:19-cv-02153-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This is my sixth request for an extension to file the Response to Petitioner's First Amended Petition for Writ of Habeas Corpus (ECF No. 20), and the instant Motion is made in good faith and not for the purpose of delay.

3. The Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20) is currently due on February 17, 2021.

4. I am unable with due diligence to timely complete the Response herein. I am still in the process of finalizing the Response. I have been facing and am currently still attempting to resolve severe on-going medical issues, including emergency medical treatment this past weekend. I am also still dealing with the continuing impact from COVID-19 and working from home. I have been diligently striving to resolve and/or work around these issues but they have significantly impacted my ability to complete the Response in a timely fashion,

5. In seeking this extension, I am taking into consideration additional obligations and deadlines for both myself and my supervising senior colleague.

6. I have spoken to counsel for Mr. Robbins, and she does not oppose this request.

7. Based on the foregoing, I respectfully request an enlargement of time of 5 days, up to and including February 22, 2021, to file the Response to the First Amended Petition for Writ of Habeas Corpus (ECF No. 20).

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1 I declare under penalty of perjury that the foregoing is true and correct.

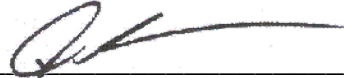
2 Executed on this 17th day of February, 2021.

3 /s/ Jaimie Stilz

4 Jaimie Stilz (Bar No. 13772)
Deputy Attorney General

5 IT IS SO ORDERED:

6 Dated: February 18, 2021

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8 ANDREW P. GORDON
9 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Office of the Nevada Attorney General and that on this 17th day of February, 2021, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS (ECF NO. 20)**, by U.S. District Court CM/ECF electronic filing, to:

Lisa A. Rasmussen, Esq.
THE LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES
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Las Vegas, NV 89104
Lisa@VeldLaw.com

/s/ C. Martinez
An employee of the Office of the Attorney General